

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|--------------------------------|---|-----------------------|
| RUTHAMAE BROWN, | : | No. 02-CV-2660 |
| | : | |
| Plaintiff, | : | |
| | : | |
| | : | |
| v. | : | |
| | : | |
| EQUICREDIT CORPORATION, | : | |
| | : | |
| Defendant. | : | |

**JOINT MOTION OF DEFENDANT EQUICREDIT CORPORATION
AND PLAINTIFF RUTHAMAE BROWN FOR EXTENSION OF TIME**

Defendant EquiCredit Corporation (“EquiCredit”) and Plaintiff Ruthamae Brown (together with EquiCredit, the “Parties”) hereby respectfully move this Court for an extension of time, until October 31, 2002, to complete discovery. The Parties also request an extension of time, until November 7, 2002, for filing summary judgment motions, and request that this Court place this case in the December 2002 trial pool. The Parties aver as follows in support of their request:

1. The Parties are negotiating a potential settlement of this case.
2. The Parties agree that this 30 day extension to the Court’s First Scheduling Order will provide the time necessary to gather additional information upon which a proper settlement may be effectuated.

WHEREFORE, for the foregoing reasons, Defendant EquiCredit Corporation and Plaintiff Ruthamae Brown respectfully request that the Court enter a Second Scheduling Order mandating the dates set forth above.

Respectfully submitted,

REED SMITH LLP

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Counsel for Defendant
EquiCredit Corporation

BANKS & BANKS

David Banks
Banks & Banks
3038 Church Road
Lafayette Hill, PA 19444

Counsel for Plaintiff Ruthamae Brown

Dated: September 27, 2002

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of September, 2002, a true and correct copy of the Joint Motion of Defendant EquiCredit Corporation and Plaintiff Ruthamae Brown for Extension of Time was served by U.S. first class mail upon the following counsel of record:

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(Co-Counsel for Plaintiff)

Barbara Kiely

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| | : | |

ORDER

Upon consideration of the Motion of Defendant EquiCredit Corporation and Plaintiff Ruthamae Brown for Extension of Time, it is hereby ORDERED that said Motion is GRANTED. The parties shall have until October 31, 2002 to complete discovery, November 7, 2002 to file motions for summary judgment and this case shall be placed in the December 2002 trial pool.

BY THE COURT

_____.J